

Representation - Modification UNC 0724 (Urgent)

Amendment to Ratchet charges during COVID-19 period

Responses invited by: **1pm on 27 April 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	27 th April 2020
Support or oppose implementation?	Support
Relevant Objective:	a) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We support this modification because it provides relief from ratchet charges and increases in capacity for Shippers whose customers increase demand as a result of responding to requests to increase production due to the Covid 19 emergency. It therefore furthers relevant objective (a) Economic and Efficient operation of the system.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

This could be implemented immediately following an Ofgem direction.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

There is very little direct impact on WWU revenue from ratchet charges is returned to the generality of Shippers through the price control arrangements. We expect this modification to only benefit a few customers but it to be a significant benefit to those few.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are aware that NGN are continuing discussions with the legal text provider regarding which legislation should be the referenced and following comments at the Distribution workgroup on 23rd April the value of one parameter in the legal text to ensure that the legal text delivers the intent of the proposal.

We would like to record our appreciation to NGN for delivering the legal text in very short timescales.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

Not applicable as this is an urgent modification.

Please provide below any additional analysis or information to support your representation